

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**SUPPRESSED  
FILED**

DEC 13 2012

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,

Plaintiff,

v.

No.

ANTHONY JOHNSON

a.k.a. "Tasha Simone"

a.k.a. "Tasha Johnson,"

CEDRIC WALTON, and

TIMOTHY MOORE

a.k.a. "Peaches,"

Defendants.

**4:12CR 00454HEA**

**INDICTMENT**

**COUNT 1 - CONSPIRACY**

The Grand Jury charges that:

1. At all times relevant to this Indictment, Defendant ANTHONY JOHNSON, a.k.a. "Tasha Simone," a.k.a. "Tasha Johnson" (referred to herein as "JOHNSON"), was residing at the Moberly Correctional Center ("MCC") in Moberly, Missouri, which is within the Eastern District of Missouri.
2. At all times relevant to this Indictment, Defendant CEDRIC WALTON (referred to herein as "WALTON"), was residing in Memphis, Tennessee.
3. At all times relevant to this Indictment, Defendant TIMOTHY MOORE, a.k.a. "Peaches" (referred to herein as "MOORE") was residing in Memphis, Tennessee.

4. At all times relevant to this Indictment, Defendants JOHNSON, WALTON, MOORE, and other persons known and unknown to the Grand Jury, referred to themselves as members of a group known as the "Hilton" family.

5. At all times relevant to this Indictment, JPay and Access Secure were entities that provided a service to prison inmates through which inmates could have money placed on account for their use.

#### THE CONSPIRACY

6. From at least July 2009 through at least March 2011, with the exact dates being unknown to the Grand Jury, in the Eastern District of Missouri and elsewhere,

**ANTHONY JOHNSON**, a.k.a. "Tasha Simmone," a.k.a. "Tasha Johnson,"  
**CEDRIC WALTON**, and  
**TIMOTHY MOORE**, a.k.a. "Peaches,"

the Defendants herein, did knowingly and willfully conspire, combine, confederate, and agree together and with each other and with other persons, both known and unknown to the Grand Jury, to commit a crime against the United States, to wit: Identity Theft in violation of Title 18, United States Code, Section 1028(a)(7), by stealing the means of identification of unsuspecting victims, opening new credit accounts using the stolen identities or adding unauthorized users to existing credit accounts of victims, and using the fraudulent credit accounts and the compromised existing credit accounts to deposit money into the accounts of inmates at the Moberly Correctional Center ("MCC").

#### MANNER AND MEANS OF THE CONSPIRACY

7. It was a part of the conspiracy that Defendant JOHNSON, while residing at MCC, directed, persuaded and coached Defendants WALTON and MOORE to contact potential victims

by telephone in order to fraudulently obtain personal identifying information, such as date of birth, social security number, and credit card number.

8. It was a further part of the conspiracy that Defendants WALTON and MOORE contacted victims by telephone and pretended to be representatives of card issuers or other commercial entities in order to deceive victims into providing their personal information.

9. It was a further part of the conspiracy that Defendant JOHNSON directed, persuaded and coached Defendants WALTON and MOORE to use the fraudulently obtained personal information of victims to apply for credit card accounts and to add themselves and others as authorized users on existing accounts.

10. It was a further part of the conspiracy that, at Defendant JOHNSON's direction, Defendants WALTON and MOORE, posing as the persons whose identities they stole, contacted banks and other credit issuing entities to apply for new credit accounts and to add themselves and others as authorized users on existing accounts.

11. It was a further part of the conspiracy that Defendants JOHNSON, WALTON, and MOORE used victims' stolen identities and fraudulently obtained credit cards to transfer money by wire transfer into the accounts of inmates at the MCC through JPay and Access Secure.

12. It was a further part of the conspiracy that Defendants JOHNSON, WALTON, and MOORE caused fraudulently obtained funds to be sent from inmate accounts to Defendants WALTON, MOORE, and other persons outside MCC.

OVERT ACTS

13. In furtherance of and to effect the object of the conspiracy, one or more of the following overt acts, among others, were committed in the Eastern District of Missouri:

- a. On or about January 13, 2010, Defendant JOHNSON contacted Defendant WALTON by telephone and provided Defendant WALTON with the names, social security numbers, and phone number of victims R.M. and D.M.;
- b. On or about January 14, 2010, Defendants JOHNSON and WALTON participated in three-way telephone calls with representatives of Access Secure and JPay, in which Defendant WALTON pretended to be victim J.D., whose credit card account number Defendant WALTON had fraudulently obtained;
- c. On or about January 14, 2010, Defendants JOHNSON and WALTON participated in a three-way telephone call with a representative of Access Secure and attempted to place money on an inmate's account using the stolen credit card numbers of victim A.D.; and
- d. On or about May 21, 2010, V.W. sent a check in the amount of \$199.00 to Defendant WALTON at an address in Memphis, Tennessee.

All in violation of Title 18, United States Code, Section 371.

**COUNT 2 - IDENTITY THEFT**

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 through 13 of Count 1 of this Indictment are restated and incorporated as if fully set forth herein.
2. On or about January 13, 2010, in the Eastern District of Missouri and elsewhere,  
**ANTHONY JOHNSON**, a.k.a. "Tasha Simmone," a.k.a. "Tasha Johnson,"

the Defendant herein, in a matter affecting interstate commerce, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the name and social security number of R.M., in connection with the commission of the offense of Wire Fraud in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

**COUNT 3 - IDENTITY THEFT**

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 through 13 of Count 1 of this Indictment are restated and incorporated as if fully set forth herein.

2. On or about January 13, 2010, in the Eastern District of Missouri and elsewhere,

**ANTHONY JOHNSON**, a.k.a. "Tasha Simmone," a.k.a. "Tasha Johnson,"

the Defendant herein, in a matter affecting interstate commerce, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the name and social security number of D.M., in connection with the commission of the offense of Wire Fraud in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

**COUNT FOUR - IDENTITY THEFT**

The Grand Jury further charges that:

1. The allegations contained in paragraphs 1 through 13 of Count One of this Indictment are restated and incorporated as if fully set forth herein.

2. On or about January 14, 2010, in the Eastern District of Missouri and elsewhere,

**ANTHONY JOHNSON**, a.k.a. "Tasha Simmone," a.k.a. "Tasha Johnson," and

**CEDRIC WALTON,**

the Defendants herein, in a matter affecting interstate commerce, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the name and credit card account number of A.D., in connection with the commission of the offense of Wire Fraud in violation of Title 18, United States Code, Section 1343.

In violation of Title 18, United States Code, Sections 1028(a)(7) and 2.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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Assistant United States Attorney